

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*¹

Debtors.

FTX TRADING LTD., ISLAND BAY VENTURES INC. and CLIFTON BAY INVESTMENTS LLC f/k/a ALAMEDA RESEARCH VENTURES LLC,

Plaintiffs,

v.

SKYBRIDGE CAPITAL II, LLC, SKYBRIDGE GP HOLDINGS LLC, DIGITAL MACRO FUND LP f/k/a SKYBRIDGE COIN FUND LP, SALT VENTURE GROUP LLC, ANTHONY SCARAMUCCI, and BRETT MESSING,

Defendants.

Chapter 11

Case No. 22-11068 (JTD)
(Jointly Administered)

Adv. Proc. No. 24-50209 (JTD)

**DECLARATION OF JONATHAN YOUNGWOOD IN SUPPORT OF
DEFENDANTS' MOTION TO COMPEL ARBITRATION
AND TO DISMISS AND/OR STAY**

I, Jonathan K. Youngwood, hereby declare under penalty of perjury:

1. Defendants SkyBridge Capital II, LLC (“SkyBridge II”), SkyBridge GP Holdings LLC (“SkyBridge GP”), Digital Macro Fund LP f/k/a SkyBridge Coin Fund LP (“SCF”), SALT Venture Group LLC (“SALT”), Anthony Scaramucci, and Brett Messing (collectively, “Defendants”) retained the law firm of Simpson Thacher & Bartlett LLP to represent them in

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

connection with the above-captioned adversary proceeding. I am a partner at Simpson Thacher & Bartlett LLP and one of the attorneys representing Defendants.

2. Attached hereto as **Exhibit A** is a true and correct copy of that certain *SALT Sponsor Agreement*, dated January 3, 2022 (the “SALT Sponsor Agreement”), by and among FTX Trading Ltd. and SALT Venture Group LLC.

3. Attached hereto as **Exhibit B** is a true and correct copy of that certain *SkyBridge Coin Fund LP, Limited Partner Interests, Subscription Booklet*, dated April 5, 2022 (the “SCF Subscription Booklet”), by and among Alameda Research Ventures LLC and SkyBridge Coin GP LLC.

4. Attached hereto as **Exhibit C** is a true and correct copy of that certain *Subscription Agreement*, dated September 7, 2022 (the “Subscription Agreement”), by and among SkyBridge Capital II, LLC, SkyBridge GP Holdings, LLC, and Island Bay Ventures, Inc.

5. Attached hereto as **Exhibit D** is a true and correct copy of that certain *Fifth Amended and Restated Limited Liability Company Agreement of SkyBridge Capital II, LLC*, dated September 7, 2022 (the “SkyBridge II LLCA”).

6. Attached hereto as **Exhibit E** is a true and correct copy of that certain *Third Amended and Restated Limited Liability Company Agreement of SkyBridge GP Holdings, LLC*, dated September 7, 2022 (the “SkyBridge GP LLCA”).

7. Attached hereto as **Exhibit F** is a true and correct copy of that certain *Proof of Claim No. 4697* filed by SkyBridge II in the above-captioned chapter 11 cases (the “SkyBridge Proof of Claim”).

8. Attached hereto as **Exhibit G** is a true and correct copy of that certain *Proof of Claim No. 5126* filed by SALT in the above-captioned chapter 11 cases (the “SALT Proof of Claim”).

9. Attached hereto as **Exhibit H** is a true and correct copy of that certain *Restricted Token Purchase Agreement*, dated September 8, 2022 (the “Token Purchase Agreement”), by and among SkyBridge II and Alameda TR Systems S.de R. L.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true correct.

Dated: January 24, 2025

Respectfully submitted,

/s/ Jonathan K. Youngwood
Jonathan K. Youngwood